

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**MOTION OF THE UNITED STATES POSTAL SERVICE
TO DESIGNATE ADDITIONAL WRITTEN-CROSS-EXAMINATION OF
ABA/EEI/NAPM WITNESS CLIFTON
(March 23, 1998)**

On February 18, 1998, during oral cross-examination of ABA/EEI/NAPM witness Clifton, the Postal Service propounded several questions to which he was unable to provide answers orally, but in response to which ABA/EEI/NAPM counsel committed to file written responses. See Tr. 18/1061, lines 13-14, 22-23; Tr. 18/1062, lines 9-12. Responses to those questions were filed on February 27, 1998. In addition, on March 6, 1998, ABA/EEI/NAPM filed Dr. Clifton's outstanding responses to other Postal Service interrogatories: USPS/ABA/EEI/NAPM-T-1-40j&k and 41.

The Postal Service hereby moves that these responses be designated into the evidentiary record as additional cross-examination of Dr. Clifton in relation to his ABA/EEI/NAPM testimony.


Two copies of each interrogatory response are being submitted to the Commission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

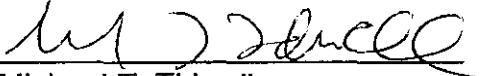
Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making



Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Michael T. Tidwell

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